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 ERIC JOHNSON  
 Chief, Organized Crime Strike Force  
 District of Nevada  
 Lloyd D. George United States Courthouse  
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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	2:09-cr-00077-JCM-PAL
Plaintiff,	)	
vs.	)	
JAN LINDSEY,	)	<b>GOVERNMENT DISCLOSURE</b>
Defendant.	)	<b>STATEMENT</b>

Pursuant to LCR 16-1(b)(2) of the Local Rules of Practice for the District of Nevada, Eric Johnson, Chief, Organized Crime Strike Force, contacted defense counsel for defendants, Richard Frankoff, Assistant Federal Public Defender, for defendant Jan Lindsey, to discuss scheduling of discovery in the instant case. The Government and defense counsel could not reach an agreement as to the date for providing certain discovery in the instant matter. Consequently, the Government has moved forward with providing discovery in this matter and is filing this Government Disclosure Statement. The Government agrees to provided discovery in the instant case as follows:

**Discovery Schedule**

A. The Government as of this date has provided:

1. All statements, documents, and objects, including audio or video recordings, required to be disclosed under Rules 16(a)(1)(A)-(F), Federal Rules of Criminal Procedure.

2. All search warrants and supporting affidavits, that relate to evidence that may be offered at trial. Except as provided below, the Government has provided defendant with copies of all items seized during the searches of defendant's residence and storage. In the case of video and audio recordings seized from the defendant, the Government will make available to defense counsel the opportunity to review and copy any recording seized. If defense counsel wishes to review any recording or view any items seized from the searches, he should contact the undersign counsel and arrange to view the items.

3. The Government will provide expert disclosures as required under Rule 16(a)(1)(G), Federal Rules of Criminal Procedure.

B. The Government requests under Rule 16, Federal Rules of Criminal Procedure, that defense counsel provide prior to trial:

1. All expert disclosures as required under Rule 16(b)(1)(C), Federal Rules of Criminal Procedure.

2. All documents, objects, and reports of examination required under Rules 16(b)(1)(A) and (B), Federal Rules of Criminal Procedure.

3. All notices of any defenses under Rule 12.1, Federal Rules of Criminal Procedure.

4. Any summaries, charts, or calculations, that will be offered at trial.

C. The Government will no later than 5 days before trial:

1. Disclose any summaries, charts, or calculations, that will be offered at trial.

2. Identify recordings, transcripts of recordings, or portions thereof, that will be offered at trial.

1           3.     Disclose any reports or memoranda of interviews of witnesses the  
2                 government intends to call in its case in chief.

3           4.     Disclose any statements of witnesses under Title 18, United States  
4                 Code, Section 3500.

5     D.     The Government hereby makes any and all demands for reciprocal disclosures from  
6             the defendant under Federal Rule of Criminal Procedure 16.

7             The disclosures set forth above apply to those objects, documents, items, and other  
8     disclosure matters that are in the possession, custody, or control of the parties at the time  
9     the obligation to disclose arises. The Government recognizes that it has a continuing duty  
10    to provide disclosures up to and through trial as to any matters required to be disclosed by  
11    statute, rule, or the United States Constitution. Additionally, the Government's intent is that  
12    nothing in this statement is intended to limit, or in any way affect, the determination of  
13    admissibility of evidence at trial or otherwise restrict or expand the remedies available to the  
14    Court for any breach of disclosure obligations as set forth in Rule 16(d).

15            The Government holds itself available to make good faith efforts to confer with  
16    defense counsel to resolve informally any dispute over the scope, manner and method of  
17    disclosures before seeking relief from the Court.

18            DATED: May 7, 2009

19                                   GREGORY A. BROWER  
20                                   United States Attorney

21                                   /s/ Eric Johnson  
22                                   ERIC JOHNSON  
23                                   Chief, Organized Crime Strike Force  
24                                   District of Nevada  
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26